

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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*This document relates to: All Actions*

**PLAINTIFFS' SUPPLEMENTAL INITIAL DISCLOSURES**

Pursuant to the Court's Order of April 12, 2011, Plaintiffs in all actions in this MDL submit the following Supplemental Initial Disclosures under Federal Rule of Civil Procedure 26(a)(1) to identify "the potential witnesses among those listed on their 26(a)(1) disclosures who[m] they have the present ability to depose either because the individual is cooperating with them or because that person is subject to service of process," and/or "whom they have a present intention either to depose or to secure a declaration from." *See* April 12, 2011 Discovery Hearing Transcript, p 13. Plaintiffs make these disclosures based on information currently available to them.<sup>1</sup> Plaintiffs reserve their right, under the Federal Rules of Civil Procedure, to further supplement these disclosures as additional information becomes known.

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<sup>1</sup> The process of identifying and securing the cooperation of witnesses outside of the jurisdiction of the United States could not begin in earnest until the Court decided the Motions to Dismiss and thereby defined the defendants who would be subject to discovery, and therefore remains ongoing at this time. Plaintiffs will supplement this list in the event they secure the cooperation of additional testifying witnesses outside of the United States, or identify other witnesses who are subject to the subpoena power of the Court whom they intend to present as testifying witnesses, whether through deposition, affirmation, or otherwise.

**I. INDIVIDUALS WITH KNOWLEDGE CONCERNING THE ACTIVITIES OF THE REMAINING DISCOVERY DEFENDANTS**

Plaintiffs in these consolidated proceedings identify the following individuals as those who may have discoverable information concerning the terror sponsorship activities of the remaining discovery defendants, and whose testimony may presently be secured through subpoena, notice of deposition, or on a cooperative basis. Plaintiffs do not consent to or authorize any communication prohibited by any applicable rule of professional conduct.

**A. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the Muslim World League (“MWL”). Individuals include, but are not limited to:**

1. Dr. Abdullah bin Abdul Mohsen al Turki  
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.  
Subject: Dr. al Turki is the current Secretary General of the Muslim World League (“MWL”) and has held that position since 2000. In his capacity as Secretary-General, Dr. al Turki has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; (ii) the operations, policies, and activities of the purported charitable organizations that fall within the umbrella of the MWL, such as the International Islamic Relief Organization (“IIRO”); and (iii) the allegations, investigations, and facts concerning the MWL’s and IIRO’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Further, Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. al Turki’s authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities’ provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Turki has knowledge and information regarding the MWL’s relationship with, and employment of, Wa’el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).
2. Dr. Abdullah bin Saleh al Obaid  
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.  
Subject: Dr. al Obaid served as Secretary General of the MWL from approximately

1995-2000. In a 1997 interview published in the MWL's own newspaper, Dr. al Obaid himself acknowledged that charges of terrorism sponsorship had been leveled against the Saudi charities, including the MWL. Dr. al Obaid further served as the head of the MWL's branch office in the United States, located at 360 S. Washington Street, Suite 300, Falls Church, VA 22046. Accordingly, Dr. al Obaid has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; (ii) the operations, policies, and activities of the purported charitable organizations that fall within the umbrella of the MWL, such as the International Islamic Relief Organization ("IIRO"); and (iii) the allegations, investigations, and facts concerning the MWL's and IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding the MWL's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

3. Dr. Abdullah Omar Naseef

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. Naseef served as Secretary General of the MWL from approximately 1983-1993. Accordingly, Dr. Naseef has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; (ii) the operations, policies, and activities of the purported charitable organizations that fall within the umbrella of the MWL, such as the International Islamic Relief Organization ("IIRO"); (iii) the allegations, investigations, and facts concerning the MWL's and IIRO's presence in Pakistan and Afghanistan during the Soviet-Afghan war and their activities in support of the mujahideen fighters; and (iv) the allegations, investigations, and facts concerning the MWL's and IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding the MWL's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

4. Wa'el Hamza Jelaidan

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: According to Jelaidan's Curriculum Vitae, he was a Director for the Muslim World League ("MWL") from approximately 1989-1994. The MWL is the parent organization of the IIRO. Jelaidan also ran the IIRO's branch office in Peshawar, Pakistan, and maintained close ties with the Director of the IIRO's branch office in the Philippines, Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups). Accordingly, Jelaidan has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Jelaidan further has knowledge and information regarding

the MWL's and IIRO's relationship with, and employment of, Mohammed Jamal Khalifa.

5. Jamal al Fadl

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: Al Fadl is a former al Qaeda official and close associate to Osama bin Laden who defected from the terror organization, became a cooperating witness for the United States, and testified at length during the United States trial on the 1998 U.S. Embassy bombings in Africa. Al Fadl has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Details of al Fadl's knowledge are presented in his publicly available interrogation, interviews, court testimony, and FBI 302 statements.

6. Wadih El Hage

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: El Hage is a former employee of the MWL, a former leader of an East African al Qaeda cell, and served as Osama bin Laden's personal secretary. El Hage was convicted for his role in the 1998 U.S. Embassy bombings in Africa. El Hage has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

7. Enaam Arnaout

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: Arnaout worked closely with Osama bin Laden, Wa'el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive Officer for the Benevolence International Foundation (an Executive Order 1322 designated entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. M. Yaqub Mirza  
Address: Upon information and belief, the individual resides in the United States and can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.  
Subject: In the years leading up to the September 11, 2001 terrorist attacks Mirza served in various positions with the MWL's branch office in the United States – Director, Secretary, Treasurer, and Registered Agent. Mirza has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Additionally, Mirza served as a long-time board member for Sana-Bell, Inc. and Sanabel al Kheer, Inc. Officials from the MWL and IIRO simultaneously held positions on those boards with Mirza, thus giving him further knowledge and information regarding the operations, policies, and activities of the MWL and IIRO.
9. Dr. Hassan A.A. Bahafzallah  
Address: Unknown.  
Subject: Bahafzallah is a former Vice-President and Director of the MWL's branch office in the United States, located at 360 S. Washington Street, Suite 300, Falls Church, VA 22046. Bahafzallah has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
10. Dr. Saleh H. Saqri  
Address: Unknown.  
Subject: Saqri was the Director of the MWL's branch office in New York from 1989-1999. Accordingly, Saqri has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
11. Stuart A. Levey  
Address: Upon information and belief, the individual resides in the United States.  
Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levey further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."



12. Barbara C. Hammerle  
Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.  
Subject: Ms. Hammerle is the current Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Ms. Hammerle further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."
13. Matthew A. Levitt  
Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1828 L Street N.W., Suite 1050, Washington, D.C. 20036.  
Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levitt further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."
14. R. Richard Newcomb  
Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.  
Subject: Mr. Newcomb served as Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
15. Juan Carlos Zarate  
Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1800 K Street, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

16. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through the office of the United States Attorney for the Northern District of Illinois, 219 S. Dearborn St., 5th Floor, Chicago, IL 60604.

Subject: Fitzgerald is the current United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

17. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the

charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

18. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

19. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Justice.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Muslim World League. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and



facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

20. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Muslim World League. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

21. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States and can be contacted through Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue, N.W., Washington, D.C. 20006.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Muslim World League. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through the National Counterterrorism Center via the Office of the Director of National Intelligence, Washington, D.C. 20511.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center ("NCTC") on June 12, 2008, upon his confirmation by the U.S. Senate and

after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter's leadership, serves as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC are responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the Muslim World League, that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

**B. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the International Islamic Relief Organization ("IIRO"). Individuals include, but are not limited to:**

1. Dr. Adnan Khalil Basha

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. Basha currently serves as Secretary General to the International Islamic Relief Organization ("IIRO") and has held that position since approximately 1997. Given his long tenure with the IIRO and his simultaneous relationship with the MWL (IIRO's parent organization), Dr. Basha has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Dr. Basha further has knowledge and information regarding the following: (i) IIRO's relationship with, and employment of, al Qaeda senior members Wa'el Hamza Jelaidan and Mohammed Jamal Khalifa; (ii) IIRO's support for al Qaeda fighters and their training camps in Afghanistan, Bosnia, Pakistan, Kashmir, and other regions; (iii) IIRO's relationship with, and employment of, Executive Order 13224 designee Abd al Hamid Sulaiman al Mujil; (iv) IIRO's support for al Qaeda and affiliated terror groups through the IIRO's branch offices in the Philippines and Indonesia; and (v) IIRO's support to the Taliban.

2. Dr. Abdullah bin Abdul Mohsen al Turki

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. al Turki is the current Secretary General of the Muslim World League ("MWL"), the parent organization of the IIRO. In his capacity as Secretary-General, Dr. al Turki has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations,

investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Further, Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. al Turki's authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities' provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Turki has knowledge and information regarding the IIRO's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden) and Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups).

3. Dr. Abdullah bin Saleh al Obaid

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. al Obaid served as Secretary General of the MWL from approximately 1995-2000, the parent organization of the IIRO. Dr. al Obaid further served as President of the IIRO Executive Council. Accordingly, Dr. al Obaid has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding the IIRO's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden) and Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups).

4. Dr. Abdullah Omar Naseef

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. Naseef served as Secretary General of the MWL from approximately 1983-1993, the parent organization of the IIRO. Accordingly, Dr. Naseef has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's presence in Pakistan and Afghanistan during the Soviet-Afghan war and their activities in support of the mujahideen fighters; and (iii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding the IIRO's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

## 5. Wa'el Hamza Jelaidan

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: According to Jelaidan's Curriculum Vitae, he was a Director for the Muslim World League ("MWL") from approximately 1989-1994. The MWL is the parent organization of the IIRO. Jelaidan also ran the IIRO's branch office in Peshawar, Pakistan, and maintained close ties with the Director of the IIRO's branch office in the Philippines, Mohammed Jamal Khalifa. Jelaidan has knowledge and information regarding the following: (i) the founding of al Qaeda, including the financial infrastructure created to support the terror group; (ii) al Qaeda's use of purported charitable organizations, such as the MWL and IIRO, to financially and materially support Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) the MWL's and IIRO's support for al Qaeda fighters and their training camps in Afghanistan, Pakistan, Kashmir, and other regions; and (iv) Jelaidan's use of the IIRO branch office in Peshawar, Pakistan to provide IIRO identification cards to al Qaeda fighters and other mujihadeen to get them across the Afghan-Pakistan border, and to facilitate the purchase of weapons for al Qaeda.

## 6. Abd al Hamid Sulaiman al Mujil

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Al Mujil has worked for the IIRO for approximately 18+ years, serving 15+ of those years as the Executive Director of the IIRO Eastern Province branch office in the Kingdom of Saudi Arabia. In his capacity as the Executive Director, al Mujil oversees and controls the operations of the Eastern Province branch which includes providing financial support to overseas IIRO branch offices such as those in the Philippines and Indonesia. On August 3, 2006, the U.S. Department of the Treasury designated al Mujil pursuant to Executive Order 13224 for using his position with the IIRO to bankroll the al Qaeda network, to support Islamic militant groups, and to fundraise for terror organizations such as the Abu Sayyaf Group and Jemmah Islamiyah. Accordingly, al Mujil has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

## 7. Saleh Ahmad Ba-aboud

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Ba-aboud is the Director of the IIRO's branch offices located around the globe. Positioned at IIRO's headquarters in Saudi Arabia, Ba-aboud monitors and supervises the activities of the IIRO branch offices. Accordingly, Ba-aboud has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and its branch offices; (ii) the extensive reporting the branch offices are required to provide to the IIRO headquarters throughout the year; and (iii) the allegations, investigations, and facts concerning the IIRO's provision of financial

and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. Jamal al Fadl

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: Al Fadl is a former al Qaeda official and close associate to Osama bin Laden who defected from the terror organization, became a cooperating witness for the United States, and testified at length during the United States trial on the 1998 U.S. Embassy bombings in Africa. Al Fadl has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Al Fadl further has knowledge and information regarding the following: (i) the IIRO's direct support to members of al Qaeda by providing them with false identification thereby enabling them to cross the Pakistan-Afghanistan border for training at al Qaeda camps; (ii) Wa'el Hamza Jelaidan's employment with the IIRO and how Jelaidan used the IIRO office in Pakistan to facilitate the purchase of weapons for al Qaeda; and (iii) Mohammed Jamal Khalifa's employment with the IIRO and Khalifa's close relationship with Osama bin Laden.

9. Randall Todd Royer (a/k/a Ismail Royer)

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: Royer is a former American mujahideen recruit who participated in the Bosnian jihad and has admitted to U.S. authorities that he aided and abetted a number of individuals in gaining entry to terrorist training camps in Pakistan for weapons and military training. Royer has further stated that the IIRO was well known for its reputation as a front for jihad and for assisting mujahideen fighters get into Bosnia using IIRO identification cards. Accordingly, Royer has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Enaam Arnaout

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: Arnaout worked closely with Osama bin Laden, Wa'el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive Officer for the Benevolence International Foundation (an Executive Order 1322 designated entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with



other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding the IIRO's operations, policies, and activities, including the allegations, investigations, and facts concerning IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. M. Yaqub Mirza

Address: Upon information and belief, the individual resides in the United States and can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: In the years leading up to the September 11, 2001 terrorist attacks Mirza served in various positions with the MWL's branch office in the United States – Director, Secretary, Treasurer, and Registered Agent. By virtue of his relationship with the MWL, Mirza has knowledge and information regarding the IIRO's activities in the United States and abroad, including but not limited to: (i) the allegations, investigations, and facts concerning the IIRO's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; and (ii) the allegations, investigations, and facts concerning the IIRO's assistance, financial or otherwise, to defendants Sana-Bell, Inc. and Sanabel al Kheer.

12. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levey further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

13. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle is the current Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Ms. Hammerle further has knowledge and

information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

14. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1828 L Street N.W., Suite 1050, Washington, D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levitt further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

15. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

16. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1800 K Street, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of the IIRO for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

17. Ambassador Philip C. Wilcox, Jr.

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Foundation for Middle East Peace, 1761 N Street, N.W., Washington, D.C. 20036.

Subject: Ambassador Foley has a long history with the U.S. Department of State, including serving as Deputy Assistant Secretary of State for Intelligence and Research and as Ambassador at Large and Coordinator for Counter Terrorism. Ambassador Foley has knowledge and information regarding the following: (i) the operations, policies, and activities of the IIRO; (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; and (iii) the IIRO's relationship with, and employment of, Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups).

18. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through the office of the United States Attorney for the Northern District of Illinois, 219 S. Dearborn St., 5th Floor, Chicago, IL 60604.

Subject: Fitzgerald is the current United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

19. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al

Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

20. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

21. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Justice.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr.

Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the International Islamic Relief Organization. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the International Islamic Relief Organization. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

23. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States and can be contacted through Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue, N.W., Washington, D.C. 20006.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the International Islamic Relief Organization. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.



## 24. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through the National Counterterrorism Center via the Office of the Director of National Intelligence, Washington, D.C. 20511.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center ("NCTC") on June 12, 2008, upon his confirmation by the U.S. Senate and after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter's leadership, serves as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC are responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the International Islamic Relief Organization, that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

## 25. Samir N. Al Hasan

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Al Hasan traveled to Afghanistan from Yemen in 1999 or 2000, attended the training camp at al Farouq, and became an al Qaeda bodyguard in August 2001. Al Hasan told U.S. authorities that he was in Afghanistan as a relief worker for the IIRO and that he received the position from the head of the IIRO. According to the Department of Defense: "The International Islamic Relief Organization was identified as an Islamic humanitarian organization with headquarters in Mecca, Saudi Arabia, and is financed by Usama bin Laden." Al Hasan has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

## 26. Said Muhammad Husayn Qahtani

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Qahtani traveled multiple times from Saudi Arabia to Afghanistan between 2000 and 2001. In May 2000, Qahtani met and stayed with Abu Zubaydah in a safehouse while waiting to travel to Afghanistan, and further joined al Qaeda after giving an oath of allegiance ("al bay'ah") to Osama bin Laden. Moreover, Qahtani wanted to go to Chechnya to fight on behalf of his Muslim counterparts. According to the Department of Defense: "The detainee contacted relief organizations such as the Islamic Relief Organization and Haramain Organization.

The detainee's intention was to join a relief organization because those entities would offer him a way to get into Chechnya, whose borders were closed at that time. Once there, the detainee would be free to leave the relief organization and join the fighting." Accordingly, Qahtani has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

27. Tariq Mahmoud Ahmed al Sawah

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Al Sawah lived in Bosnia and Croatia where he worked as a relief worker for the IIRO. He chose to go to the Balkans region after watching videos depicting the atrocities committed by Serbs against Bosnians, and eventually joined the Bosnian Third Army, whose members were predominantly Arab Mujahedin fighters. Al Sawah was expelled from Bosnia in 2000 and traveled to Afghanistan where he attend the al Farouq training camp and further served as an advanced explosives trainer at the Tarnak Farm training camp. Further, he authored a 400 page manuscript containing bomb-making techniques and provided it to al Qaida members. Al Sawah further met Ayman al Zawahiri in 2002 and also attended a banquet dinner with Osama bin Laden and a senior al Qaida lieutenant. Moreover, al Sawah's design for a shoe bomb technically matched the design of the shoe bomb used by Richard Reid in his failed attempt to bring down American Airlines Flight 63. Al Sawah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

28. Khalid Sheikh Mohammed

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Khalid Sheikh Mohammed ("KSM") is a former senior member of al Qaeda and the mastermind of the September 11 attacks. The IIRO allegedly provided KSM with IIRO identification/employment cards during the Bosnian war so that KSM could enter the region to conduct jihad. Accordingly, KSM has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

**C. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the World Assembly of Muslim Youth (“WAMY”). Individuals include, but are not limited to:**

1. Saleh al Wohaibi

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at the Law Firm of Omar T. Mohammedi, LLC, Woolwoth Building, 233 Broadway, Suite 801, New York, NY 10279.

Subject: Al Wohaibi currently serves as the Secretary General for the World Assembly of Muslim Youth (“WAMY”). In his capacity as Secretary-General, al Wohaibi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

2. Dr. Manih ibn Hammad al Juhani

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Dr. al Juhani served as Secretary General of WAMY from approximately 1986-2002. Accordingly, Dr. al Juhani has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

3. Dr. Abdullah bin Abdul Mohsen al Turki

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. al Turki’s authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities’ provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, particularly as they relate to WAMY.

4. Enaam Arnaout

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: Arnaout worked closely with Osama bin Laden, Wa’el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive

Officer for the Benevolence International Foundation (an Executive Order 1322 designated entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding WAMY's operations, policies, and activities, including the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

5. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle is the current Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

7. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1828 L Street N.W., Suite 1050, Washington, D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as Director of the U.S. Department of the

Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1800 K Street, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through the office of the United States Attorney for the Northern District of Illinois, 219 S. Dearborn St., 5th Floor, Chicago, IL 60604.

Subject: Fitzgerald is the current United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.



11. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

12. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

13. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Justice.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the World Assembly of Muslim Youth. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

14. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the World Assembly of Muslim Youth. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

15. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States and can be contacted through Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue, N.W., Washington, D.C. 20006.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms.

Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the World Assembly of Muslim Youth. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

16. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through the National Counterterrorism Center via the Office of the Director of National Intelligence, Washington, D.C. 20511.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center ("NCTC") on June 12, 2008, upon his confirmation by the U.S. Senate and after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter's leadership, serves as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC are responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the World Assembly of Muslim Youth, that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

**D. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the Al Haramain Islamic Foundation. Individuals include, but are not limited to:**

1. Aqeel Abdelaziz al Aqil

Address: Unknown

Subject: Al Aqil is a founder and long-time leader of the Al Haramain Islamic Foundation, serving as its Chairman, Director General, and as the President of the al Haramain United States branch. Accordingly, al Aqil has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. An Executive Order 13224 designee himself, al Aqil further has knowledge and information regarding the following: (i) al Haramain's sponsorship of al Qaeda's operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee for Kosovo and Chechnya; (ii) al Haramain's funding of terror organizations designated by the United States government – Jemmah Islamiya, al Ittihad al Islamiya, Egyptian Islamic Jihad, HAMAS, and Lashkar e Taibah; and (iii) the Department of the Treasury's

Executive Order 13224 designations of the al Haramain organization in its entirety for "providing financial and material support to the al Qaida network."

2. Soliman al Buthe

Address: Upon information and belief, the individual can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Al Buthe is a co-founder of the al Haramain United States branch and further served as its Treasurer. Accordingly, al Buthe has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. An Executive Order 13224 designee himself, al Buthe further has knowledge and information regarding the following: (i) al Haramain's sponsorship of al Qaeda's operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee for Kosovo and Chechnya; (ii) al Haramain's funding of terror organizations designated by the United States government – Jemmah Islamiya, al Ittihad al Islamiya, Egyptian Islamic Jihad, HAMAS, and Lashkar e Taibah; and (iii) the Department of the Treasury's Executive Order 13224 designations of the al Haramain organization in its entirety for "providing financial and material support to the al Qaida network."

3. Perouz Sedaghaty

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Sedaghaty is a co-founder of the al Haramain United States branch and further served as its Secretary. Accordingly, Sedaghaty has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. On September 9, 2010, a grand jury in Eugene, Oregon convicted Sedaghaty of two felonies relating to al Haramain's efforts to send nearly \$150,000 to support religious extremist militants in Chechnya. Sedaghaty further has knowledge and information regarding the following: (i) al Haramain's sponsorship of al Qaeda's operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee for Kosovo and Chechnya; (ii) al Haramain's funding of terror organizations designated by the United States government – Jemmah Islamiya, al Ittihad al Islamiya, Egyptian Islamic Jihad, HAMAS, and Lashkar e Taibah; and (iii) the Department of the Treasury's Executive Order 13224 designations of the al Haramain organization in its entirety for "providing financial and material support to the al Qaida network."

4. Mansour al Kadi

Address: Unknown

Subject: Al Kadi is a longtime employee of the Al Haramain Islamic Foundation, serving as its Deputy Director General, head of al Haramain's Africa Committee, and Vice-President of the al Haramain United States branch. Accordingly, al Kadi

has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Al Kadi further has knowledge and information regarding the following: (i) al Haramain's sponsorship of al Qaeda's operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee for Kosovo and Chechnya; (ii) al Haramain's funding of terror organizations designated by the United States government – Jemmah Islamiya, al Ittihad al Islamiya, Egyptian Islamic Jihad, HAMAS, and Lashkar e Taibah; and (iii) the Department of the Treasury's Executive Order 13224 designations of the al Haramain organization in its entirety for "providing financial and material support to the al Qaida network."

5. Dr. Abdullah bin Abdul Mohsen al Turki

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. al Turki's authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities' provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, particularly as they relate to al Haramain.

6. Enaam Arnaout

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: Arnaout worked closely with Osama bin Laden, Wa'el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive Officer for the Benevolence International Foundation (an Executive Order 1322 designated entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding al Haramain's operations, policies, and activities, including the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.



## 7. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States.

## 8. Mark. D. Roberts

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Roberts was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States.

## 9. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle is the current Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States.

## 10. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1828 L Street N.W., Suite 1050, Washington, D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States.

## 11. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States.

## 12. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1800 K Street, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of al Haramain for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

13. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

14. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

15. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through the office of the United States Attorney for the

Northern District of Illinois, 219 S. Dearborn St., 5th Floor, Chicago, IL 60604.

Subject: Fitzgerald is the current United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

16. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Justice.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Al Haramain Islamic Foundation. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

17. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity

extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Al Haramain Islamic Foundation. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

18. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States and can be contacted through Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue, N.W., Washington, D.C. 20006.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Al Haramain Islamic Foundation. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

19. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through the National Counterterrorism Center via the Office of the Director of National Intelligence, Washington, D.C. 20511.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center ("NCTC") on June 12, 2008, upon his confirmation by the U.S. Senate and after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter's leadership, serves as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC are responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the Al Haramain Islamic Foundation,



that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

20. Said Muhammad Husayn Qahtani

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Qahtani traveled multiple times from Saudi Arabia to Afghanistan between 2000 and 2001. In May 2000, Qahtani met and stayed with Abu Zubaydah in a safehouse while waiting to travel to Afghanistan, and further joined al Qaeda after giving an oath of allegiance ("al bay'ah") to Osama bin Laden. Moreover, Qahtani wanted to go to Chechnya to fight on behalf of his Muslim counterparts. According to the Department of Defense: "The detainee contacted relief organizations such as the Islamic Relief Organization and Haramain Organization. The detainee's intention was to join a relief organization because those entities would offer him a way to get into Chechnya, whose borders were closed at that time. Once there, the detainee would be free to leave the relief organization and join the fighting." Accordingly, Qahtani has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

21. Abdul al Salam al Hilal

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Al Hilal, who has been linked to members of al Qaida, Egyptian Islamic Jihad, and the Islamic Army of Aden, has stated to U.S. authorities that he has been involved in aiding al Qaeda and other extremists since 1996. According to the Department of Defense, al Hilal met with the director of the al Haramain office in July 1999 where they discussed a plan to attack the British and American embassies. Al Hilal has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

**E. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the Rabita Trust. Individuals include, but are not limited to:**

1. Wa'el Hamza Jelaidan

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Jelaidan, an Executive Order 13224 designee, served as Rabita Trust's Director General, and was further appointed to Rabita's Board of Trustees.

Accordingly, Jelaidan has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

2. Dr. Abdullah bin Abdul Mohsen al Turki

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: In 1993, Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. Those charities under Dr. al Turki's authority included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities' provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, particularly as they relate to Rabita Trust. Moreover, Dr. al Turki has knowledge and information regarding Rabita Trust's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

3. Dr. Abdullah bin Saleh al Obaid

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. al Obaid served as a member of Rabita Trust's Board of Trustees.

Accordingly, Dr. al Obaid has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding Rabita Trust's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

4. Dr. Adnan Khalil Basha

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon &

Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. Basha served as a member of Rabita Trust's Board of Trustees.

Accordingly, Dr. Basha has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. Basha has knowledge and information regarding Rabita Trust's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

5. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levey further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida."

6. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle is the current Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Ms. Hammerle further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida."

7. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1828 L Street N.W., Suite 1050, Washington, D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levitt further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust

for “its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida.”

8. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as Director of the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”) from 1987 to 2004. In his capacity as OFAC’s Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government’s investigations of Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Newcomb further has knowledge and information regarding the U.S. Department of the Treasury’s Executive Order 13224 designation of Rabita Trust for “its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida.”

9. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1800 K Street, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department’s domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department’s powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government’s investigations of Rabita Trust for “its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida.”

10. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities’ provision of weapons, visas and passports, identification cards, safe

houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

11. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

12. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through the office of the United States Attorney for the Northern District of Illinois, 219 S. Dearborn St., 5th Floor, Chicago, IL 60604.

Subject: Fitzgerald is the current United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World



League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

13. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Justice.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Rabita Trust. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

14. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Rabita Trust. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

15. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States

and can be contacted through Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue, N.W., Washington, D.C. 20006.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Rabita Trust. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

**F. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of Sana Bell, Inc. Individuals include, but are not limited to:**

1. M. Yaqub Mirza

Address: Upon information and belief, the individual resides in the United States and can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Mirza was an original member of Sana-Bell, Inc.'s Board of Trustees when it was incorporated in Washington, D.C. on July 28, 1989. Initial board members also included Ibrahim Afandi and Saleh Kamel, who have been identified as al Qaeda's top financial sponsors. Mirza remained a board member until Sana-Bell ceased to exist in or around 2002. Accordingly, Mirza has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

2. Dr. Saleh H. Saqri

Address: Unknown.

Subject: Saqri is a former member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, Saqri has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

3. Dr. Abdullah bin Saleh al Obaid  
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.  
Subject: Al Obaid is a former member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, al Obaid has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
4. Dr. Adnan Khalil Basha  
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.  
Subject: Basha is a former member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, Basha has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
5. Dr. Hassan A.A. Bahafzallah  
Address: Unknown.  
Subject: Bahafzallah is a former member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, Bahafzallah has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
6. Abdullah A. al Noshan  
Address: Unknown.  
Subject: Noshan is a former member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, Noshan has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
7. Dr. Abdulrahamn al Saati  
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the Islamic Economics Research Center, King Abdulaziz University, Jeddah, Saudi Arabia.  
Subject: Al Saati is an original member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, al Saati has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and

facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. Dr. Farid Yasin Qurashi

Address: Upon information and belief, the individual can be contacted through the International Islamic Relief Organization in the Kingdom of Saudi Arabia, and/or through the IIRO's attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Qurashi is an original member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, Qurashi has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Sulaiman al Rajhi

Address: Upon information and belief, the individual can be contacted through the Al Rajhi Banking and Investment Corporation, Riyadh, Saudi Arabia or through the attorneys at Fish & Richardson, 717 Main Street, Suite 5000, Dallas, Texas 75201.

Subject: Al Rajhi is an original member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, al Rajhi has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Ibrahim Afandi

Address: Upon information and belief, the individual can be contacted through the Sheikh Ibrahim Afandi Group, Jeddah, Saudi Arabia.

Subject: Afandi is an original member of Sana-Bell, Inc.'s Board of Trustees and has been identified as one of al Qaeda's top financial sponsors. Accordingly, Afandi has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. Saleh Kamel

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Kamel is an original member of Sana-Bell, Inc.'s Board of Trustees and has been identified as one of al Qaeda's top financial sponsors. Accordingly, Afandi has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

**G. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of Sanabel al Kheer, Inc. Individuals include, but are not limited to:**

1. M. Yaqub Mirza

Address: Upon information and belief, the individual resides in the United States and can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Mirza was an original member of the Sanabel al Kheer, Inc.'s Board of Directors when it was incorporated in the Commonwealth of Virginia on August 14, 2000. Mirza also served as Sanabel's Secretary and Registered Agent, and remained a board member until sometime between July 2004 and April 1, 2005.

Accordingly, Mirza has knowledge and information regarding: (i) the operations, policies, and activities of Sanabel al Kheer; and (ii) the allegations, investigations, and facts concerning Sanabel al Kheer's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

2. Abdelmoniem M. El Hillali

Address: Upon information and belief, the individual can be contacted through the attorneys at Manning Sossamon PLLC, 1120 20<sup>th</sup> Street, N.W., Suite 700N, Washington, D.C. 20036.

Subject: Mr. El Hillali is the current President of Sanabel al Kheer, Inc., and has previously served as its Vice-President and Secretary. Mr. El Hillali has knowledge and information regarding the operations, policies, and activities of Sanabel al Kheer.

3. Gregory Brown

Address: Upon information and belief, the individual can be contacted through the attorneys at Manning Sossamon PLLC, 1120 20<sup>th</sup> Street, N.W., Suite 700N, Washington, D.C. 20036.

Subject: Mr. Brown is the current Secretary of Sanabel al Kheer, Inc. Mr. Brown has knowledge and information regarding the operations, policies, and activities of Sanabel al Kheer.

4. Dr. Abdullah bin Saleh al Obaid

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Al Obaid was an original member of the Sanabel al Kheer, Inc.'s Board of Directors when it was incorporated in the Commonwealth of Virginia on August 14, 2000. Al Obaid also served as Sanabel's President. Accordingly, al Obaid has knowledge and information regarding: (i) the operations, policies, and activities of Sanabel al Kheer; and (ii) the allegations, investigations, and facts concerning Sanabel al Kheer's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.



5. Dr. Hassan A.A. Bahafzallah

Address: Unknown.

Subject: Bahafzallah was an original member of the Sanabel al Kheer, Inc.'s Board of Directors when it was incorporated in the Commonwealth of Virginia on August 14, 2000. Bahafzallah also served as Sanabel's Vice-President. Accordingly, Bahafzallah has knowledge and information regarding: (i) the operations, policies, and activities of Sanabel al Kheer; and (ii) the allegations, investigations, and facts concerning Sanabel al Kheer's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Hassan Nahli

Address: Upon information and belief, the individual can be contacted through the attorneys at Manning Sossamon PLLC, 1120 20<sup>th</sup> Street, N.W., Suite 700N, Washington, D.C. 20036.

Subject: Upon information and belief, Nahli currently holds, or has held, custody of Sanabel al Kheer, Inc.'s financial and accounting books. Nahli has knowledge and information regarding the operations, policies, and activities of Sanabel al Kheer.

**H. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the Dubai Islamic Bank ("DIB"). Individuals include, but are not limited to:**

1. Saeed Ahmed Lootah

Address: Unknown.

Subject: Mr. Lootah is a co-founder and top shareholder of Dubai Islamic Bank ("DIB"). Mr. Lootah was identified by Jamal al Fadl as one of al Qaeda's contacts at DIB. As a result of his long-standing relationship with the bank, Mr. Lootah has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11<sup>th</sup> hijackers; (iii) DIB accounts that were frozen following the September 11<sup>th</sup> attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Mr. Lootah has knowledge and information regarding his own relationship with al Qaeda members such as Saidi Madani al Tayyib, and any financial services DIB provided to al Tayyib and other members and/or sympathizers of al Qaeda.

2. Dr. Hussain Hamid Hassan

Address: Unknown.

Subject: Dr. Hassan is the current Chairman of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Hassan has knowledge and information regarding the Board's supervision and control over

much of DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Hassan further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11<sup>th</sup> hijackers; (iii) DIB accounts that were frozen following the September 11<sup>th</sup> attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Hassan has knowledge and information regarding his relationship with Abdullah Azzam, co-founder of al Qaeda and spiritual mentor to Osama bin Laden.

3. Dr. Ajeel Jassem Nashmi

Address: Unknown.

Subject: Dr. Nashmi is a current member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Nashmi has knowledge and information regarding the Board's supervision and control over much of DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Nashmi further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11<sup>th</sup> hijackers; (iii) DIB accounts that were frozen following the September 11<sup>th</sup> attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Nashmi has knowledge and information regarding his own statements and/or publications advocating jihad.

4. Sheikh Mohammed Abdul Razak Alsidiq

Address: Unknown.

Subject: Sheikh Alsidiq is a current member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Sheikh Alsidiq has knowledge and information regarding the Board's supervision and control over much of DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Sheikh Alsidiq further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama

bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11<sup>th</sup> hijackers; (iii) DIB accounts that were frozen following the September 11<sup>th</sup> attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Nashmi has knowledge and information regarding his own statements and/or publications advocating jihad.

5. Sheikh Ali Muhssein al Din Qaradaghi

Address: Unknown.

Subject: Sheikh Qaradaghi is a current member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Sheikh Qaradaghi has knowledge and information regarding the Board's supervision and control over much of DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Sheikh Qaradaghi further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11<sup>th</sup> hijackers; (iii) DIB accounts that were frozen following the September 11<sup>th</sup> attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Qaradaghi has knowledge and information regarding his own statements and/or publications advocating jihad.

6. Ambassador James Foley

Address: Upon information and belief, the individual can be contacted through the office of the U.S. Ambassador to the Republic of Croatia.

Subject: Ambassador Foley has a long history with the U.S. Department of State, including serving as State Department Deputy Spokesman and Principal Deputy Assistant Secretary for Public Affairs from 1997-2000. In that capacity, Ambassador Foley has information and knowledge regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to, requests by the United States government to DIB and/or the United Arab Emirates to end the financial relationship between Osama bin Laden and DIB, and to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism.

7. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from

1997-2004. In that capacity, Mr. Tenet has information and knowledge regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to, requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism.

8. Madeline K. Albright

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Partnership For a Secure America, 2000 P Street, N.W., Suite 505, Washington, D.C. 20036.

Subject: Ms. Albright served as the U.S. Secretary of State from 1997-2001. In that capacity, Ms. Albright has information and knowledge regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to, requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism.

9. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda, including bin Laden's use of certain Middle Eastern banks to launder and distribute funds for terrorist activities; and (ii) the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, the Taliban, al Qaeda, and affiliated terrorist organizations.

10. Mustafa Ahmed al Hawsawi

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: In addition to managing bank accounts for, and/or for the benefit of, Osama bin Laden himself, DIB provided financial services to al Qaeda's financial officer, Mustafa Ahmed al Hawsawi. Prior to the September 11 attacks, al Hawsawi used his accounts at DIB to deposit approximately \$148,895 USD into bank accounts in Dubai that were held by two of the 9/11 hijackers, including at

least one account at DIB. Additionally, in the days just prior to the attacks, the 9/11 hijackers were returning their unused funds to al Hawsawi in the UAE. Mohamed Atta wired at least \$7,860 back to al Hawsawi on September 8, 2001. On September 9th, hijacker Waleed al Shehri wired \$5,000 to al Hawsawi. The day before the attack on September 10th, hijacker Marwan al Shehhi wired \$5,400 to al Hawsawi. Accordingly, al Hawsawi has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.

11. Ali Abdul Aziz Ali

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Khalid Sheikh Mohammed's nephew, Ali Abdul Aziz Ali (a/k/a Ammar al Baluchi), was instrumental in providing financial and travel assistance for the September 11, 2001 plot via his account(s) at DIB. According to the 9-11 Commission Final Report, Ali transferred \$5,000 to 9/11 hijackers Nawaf al Hazmi and Khalid al Mihdhar in California. Ali was similarly sending funds to the al Qaeda cell in Hamburg, Germany. The 9-11 Report states that the Hamburg operatives paid for their flight training primarily with funds wired from Dubai by KSM's nephew. Between June 29 and September 17, 2000, Ali sent Marwan al Shehhi and Mohamed Atta a total of \$114,500 in five transfers ranging from \$5,000 to \$70,000. Department of Defense Unclassified Summaries of Evidence for detainees incarcerated at Guantanamo Bay, including Ali himself, confirm that Ali opened an account at DIB. Accordingly, Ali has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.

12. Khalid Sheikh Mohammed

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Khalid Sheikh Mohammed ("KSM") is a former senior member of al Qaeda and the mastermind of the September 11, 2001 attacks. In furtherance of al Qaeda's objective to attack the United States on September 11, and pursuant to KSM's instructions, Ali Abdul Aziz Ali (KSM's nephew) provided financial and travel assistance to the 9/11 hijackers via his account(s) at DIB. KSM has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.



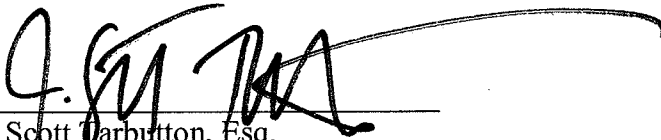
Dated: May 19, 2011

Respectfully submitted,

*MDL Plaintiffs' Executive Committees*  
THE MDL 1570 PLAINTIFFS'  
EXECUTIVE COMMITTEES

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Plaintiffs' Supplemental Initial Disclosures was filed electronically this 19th day of May 2011. Notice of this filing will be sent to all parties in 03 MDL 1570 by operation of the Southern District of New York's Electronic Case Filing ("ECF") system. Parties may access this filing through the Court's ECF system.

  
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J. Scott Tarbutton, Esq.